

**Federal Defenders
OF NEW YORK, INC.**

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March 18, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)**

Dear Judge Furman:

The defense respectfully seeks a 60-day adjournment of the sentencing proceeding in the above-captioned case and requests that the Court sentence Mr. Avenatti via videoconference. The Government objects to an adjournment, but does not object to a remote sentencing hearing.

A 60-day adjournment is necessary to afford the defense adequate time to prepare and obtain mitigation related to loss-amount arguments under Application Note 3(E)(i) to U.S.S.G. § 2B1.1 and 18 U.S.C. § 3553(a). The defense also anticipates pursuing variance-related arguments under 18 U.S.C. § 3553(a)(2)(D) and requires additional time to obtain relevant records and data.

Respectfully Submitted,

/s/
Robert M. Baum, Esq.
Andrew J. Dalack, Esq.
Tamara L. Giwa, Esq.
Assistant Federal Defenders

Cc: Government Counsel

Counsel for Michael Avenatti